

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

1

CASE NO. 22-CR-80146-CANNON

UNITED STATES OF AMERICA

vs.

MAHANDRA SOOKRAM,

Defendant.

\_\_\_\_\_ /

FACTUAL PROFFER

The United States Attorney's Office for the Southern District of Florida and MAHANDRA SOOKRAM (hereinafter the "defendant") agree that had this case proceeded to trial, the United States would have proven the following elements and facts beyond a reasonable doubt:

ELEMENTS

1. The defendant attempted to bring an alien into the United States;
2. The defendant knew at the time of the attempted entry that the person was an alien;
3. The alien had not received prior official authorization to enter; and
4. The defendant knew, or recklessly disregarded, the fact that the alien had no prior authorization to enter.<sup>1</sup>

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<sup>1</sup> "Reckless disregard" means deliberate indifference to facts which, if considered and weighed in a reasonable manner, indicate the highest probability that the alleged aliens were in fact aliens and were in the United States unlawfully.

**FACTS**

1. On August 31, 2022, law enforcement officers (“Officers”) observed the defendant MAHANDRA SOOKRAM (“SOOKRAM”) piloting a vessel (the “Vessel”), that contained six passengers, approximately 20 nautical miles east of the Lake Worth Inlet, within the Special Maritime and Territorial Jurisdiction of the United States. The Vessel was thereafter interdicted by Officers in the vicinity of Lake Worth Inlet. Defendant SOOKRAM was questioned and advised Officers that he was a U.S. Citizen, while the six passengers reported that they were Guyanese nationals.

2. Then, Officers reviewed the GPS device located on the Vessel, which revealed that the Vessel departed from a Marina located in Palm Beach County, Florida, at approximately 6:40 a.m. that morning, and arrived at the Old Bahama Bay resort at West End, Bahamas at approximately 9:40 a.m. the same day. The GPS device further revealed that at approximately 8:05 p.m. the same day, the Vessel departed West End, Bahamas and traveled due west towards the United States, ultimately being stopped in the vicinity of Lake Worth Inlet at approximately 10:15 p.m.

3. As part of the investigation, Officers conducted database checks concerning the six Guyanese nationals located on the Vessel and discovered that none of the six individuals applied for, or received permission to, enter the United States.

4. A review of the cellular telephone seized from defendant SOOKRAM’s person revealed text message communications between himself and others in which defendant SOOKRAM discussed transporting individuals to the United States from the Bahamas, for a fee per person. Several of the text message exchanges were linked to one or more passengers

located on the Vessel on August 31, 2022.

3

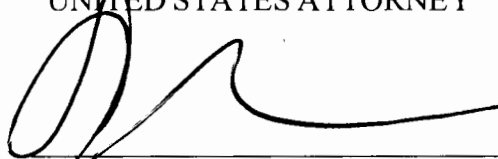
5. All events occurred in the Southern District of Florida and elsewhere.

MARKEZY LAPOINT  
UNITED STATES ATTORNEY

Date:

1/10/23

By:



LARA TREINIS GATZ  
ASSISTANT U.S. ATTORNEY

Date:

1/10/2023

By:

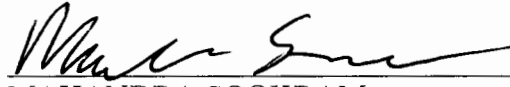


CAROLINE McCRAE  
ASSISTANT FEDERAL PUBLIC DEFENDER

Date:

1/10/2023

By:



MAHANDRA SOOKRAM  
DEFENDANT